

**SEARCH AND SEIZURE: Probable cause may arise from use of any of an officer's senses.....Revised 12/2009**

“Probable cause may arise from use of an officer's senses.” *State v. Valenzuela*, 121 Ariz. 274, 275, 589 P.2d 1306, 1307 (1979); *State v. Decker*, 119 Ariz. 195, 197, 580 P.2d 333, 335 (1978). As the United States Supreme Court has said:

Incontrovertible testimony of the senses that an incriminating object is on premises belonging to a criminal suspect may establish the fullest possible measure of probable cause.

*Washington v. Chrisman*, 455 U.S. 1, 11 (1982), quoting *Coolidge v. New Hampshire*, 403 U.S. 443, 468 (1971).